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Honorable Frederick P. Corbit
Chapter 7

4 Attorneys for U.S. Bank National Association
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7 UNITED STATES BANKRUPTCY COURT
8 EASTERN DISTRICT OF WASHINGTON

9 In re

10 GOLD DIGGER APPLES, INC.,
91-0348985

11 Debtor.
12
13

Case No. 16-01783-FPC7

NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE

14 PLEASE TAKE NOTICE that U.S. Bank National Association
15 (“U.S. Bank”), a creditor and party-in-interest in the above-referenced case, by and
16 through its undersigned attorneys, hereby enters its appearance pursuant to
17 Bankruptcy Rule 9010(b). Such attorneys hereby request, pursuant to Bankruptcy
18 Rules 2002 and 9007 and Section 342 of the Bankruptcy Code, that copies of all
19 notices and pleadings given or filed in this case be given and served upon the
20 undersigned at the following address, facsimile and telephone numbers, and e-mail
21 address:
22

NOTICE OF APPEARANCE AND REQUEST FOR
SPECIAL NOTICE - 1

MILLER NASH GRAHAM & DUNN LLP
ATTORNEYS AT LAW
T: (503) 224-5858 | F: (503) 224-0155
3400 U.S. BANCORP TOWER
111 S.W. FIFTH AVENUE
PORTLAND, OREGON 97204

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1 Teresa H. Pearson
2 Miller Nash Graham & Dunn LLP
3 1515 S.W. Fifth Avenue, Suite 3400
4 Portland, Oregon 97204
5 Telephone: 503-205-2646
6 Facsimile: 503-224-0155
7 Email: teresa.pearson@millernash.com

8 PLEASE TAKE FURTHER NOTICE that the foregoing demand
9 includes not only the notices and papers referred to in the Rules specified above
10 but also includes, without limitation, any notice, application, complaint, demand,
11 motion, petition, pleading, or request, whether formal or informal, written or oral,
12 and whether transmitted or conveyed by mail, delivery, telephone, e-mail, or
13 otherwise filed or made with regard to the referenced cases and proceedings
14 therein.

15 Neither this request for special notice nor any subsequent appearance,
16 pleading, claim, or suit is intended or shall be deemed to waive U.S. Bank's
17 (i) right to have final orders entered only after *de novo* review by a higher court,
18 (ii) right to trial by jury in any proceeding so triable herein or in any case,
19 controversy or proceeding related hereto, (iii) right to have the reference
20 withdrawn in any matter subject to mandatory or discretionary withdrawal, or
21 (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which U.S.
22 Bank may be entitled under agreements, at law, or in equity, all of which rights,
claims, actions, defenses, setoffs and recoupments expressly are reserved.

NOTICE OF APPEARANCE AND REQUEST FOR
SPECIAL NOTICE - 2

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T: (503) 224-5858 | F: (503) 224-0155
3400 U.S. BANCORP TOWER
111 S.W. FIFTH AVENUE
PORTLAND, OREGON 97204

1 DATED this 1st day of June, 2016.

2 MILLER NASH GRAHAM & DUNN LLP

3 /s/ Teresa H. Pearson

4 Teresa H. Pearson, P.C., WSB No. 25889
5 teresa.pearson@millernash.com
(503) 224-5858

6 Attorneys for Secured Creditor
7 U.S. Bank National Association
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NOTICE OF APPEARANCE AND REQUEST FOR
SPECIAL NOTICE - 3

MILLER NASH GRAHAM & DUNN LLP

ATTORNEYS AT LAW
T: (503) 224-5858 | F: (503) 224-0155
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111 S.W. FIFTH AVENUE
PORTLAND, OREGON 97204

1 I hereby certify that I served the foregoing NOTICE OF
2 APPEARANCE AND REQUEST FOR SPECIAL NOTICE on:

3 Jeffrey B Earl jearl98837@yahoo.com, WA09@ecfcbis.com

4 Dan ORourke dorourke@southwelloorourke.com,
5 tina@southwelloorourke.com

6 US Trustee USTP.REGION18.SP.ECF@usdoj.gov

7 by transmitting full, true, and correct copies thereof to the attorney through the
8 court's **Cm/ECF system** on the date set forth below.

9 DATED this 1st day of June, 2016.

10
11 /s/ Teresa H. Pearson
12 Teresa H. Pearson, P.C.
13 Washington State Bar No. 25889
14 Of Attorneys for Creditor
15 U.S. Bank National Association
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